

DAVID H. BECKER, ESQ. (Pro Hac Vice)
Oregon Bar No. 081507
Law Office of David H. Becker, LLC
917 SW Oak St., Suite 409
Portland, Oregon 97205
(503) 388-9160
davebeckerlaw@gmail.com

DAVID A. BAHR, ESQ. (Pro Hac Vice)
Oregon Bar No. 90199
Bahr Law Offices, P.C.
1035 1/2 Monroe St.
Eugene, Oregon 97402
(541) 556-6439
davebahr@mindspring.com

WOLF, RIFKIN, SHAPIRO,
SCHULMAN & RABKIN, LLP
CHRISTOPHER W. MIXSON, ESQ.
Nevada Bar No. 10685
5594-B Longley Lane
Reno, Nevada 89511
(775) 853-6787/Fax: (775) 853-6774
cmixson@wrslawyers.com

Attorneys for Plaintiff Basin and Range Watch

STEVEN W. MYHRE
Acting United States Attorney
District of Nevada
TROY K. FLAKE
Assistant United States Attorney
U.S. Attorney's Office
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
Telephone: 702-388-6336
Facsimile: 702-388-6787
Email: troy.flake@usdoj.gov

Attorneys for the Federal Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BASIN AND RANGE WATCH,

Plaintiff,

v.

BUREAU OF LAND MANAGEMENT
AND THE U.S. DEPARTMENT OF THE
INTERIOR,

Defendants.

Civil Action No.: 2:16-cv-00403 JCM-PAL

**JOINT MOTION FOR EXTENSION OF
BRIEFING ON FEES MOTION
(FIRST REQUEST)**

On January 21, 2017, the Court entered an order (ECF #41) setting a briefing schedule for the parties Motion for Attorneys' Fees and Costs. Plaintiff filed its Motion for Attorneys' Fees and Costs on March 1, 2017. The briefing schedule called for Federal Defendants to file their response by March 31,

1 2017, and for Plaintiff to file its reply by April 21, 2017. It is expected that resolution of the fees motion
2 will be dispositive of this case. *See* ECF #55 at 2:1-2.

3 The parties respectfully request that the briefing schedule be modified as follows:

4 **April 14, 2017** – Federal Defendants’ Response to Motion for Attorneys’ Fees and Costs

5 **May 17, 2017** – Plaintiff’s Reply in Support of Motion for Attorneys’ Fees and Costs

6 The parties do not seek this extension for purposes of delay, and good cause exists for the court to
7 grant this extension. Specifically the need for additional time is a result of delays caused by reduced
8 staffing levels at the agencies involved and official travel by the attorney for the Federal defendant, and
9 Plaintiff’s counsel’s previously-scheduled travel throughout the last week of April and obligation on
10 other matters. The parties are confident that this additional time will be adequate to complete the
11 briefing.

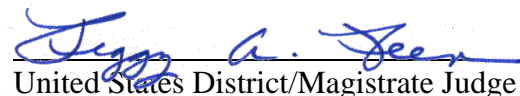
12 Respectfully submitted this 28th day of March 2017.

13 STEVEN W. MYHRE
14 Acting United States Attorney

15 /s/ Troy K. Flake
16 Troy K. Flake
17 Assistant United States Attorney
18 *Of Attorneys for Federal Defendants*

/s/ David H. Becker
David H. Becker, *Pro Hac Vice*
Of Attorneys for Plaintiff

20
21 It is so ordered.

22 
23 United States District/Magistrate Judge

24 Dated: March 31, 2017
25
26